



International Union of Operating Engineers

AFFILIATED WITH THE AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS

January 18, 2022

F. David Radford
Deputy State Director of Geospatial Services
BLM Eastern States Office
5275 Leesburg Pike
Falls Church, Virginia 22041
Submitted via email - BLM_ES_Lands@blm.gov

RE: Superior National Forest Withdrawal Application

Dear Mr. Radford,

The International Union of Operating Engineers opposes the Superior National Forest Withdrawal Application. The proposed withdrawal of 225,000 acres of federally-owned land in Northeast Minnesota from future leasing, exploration and potential mineral development ignores established regulatory and environmental review processes. It will also further America's dependence on critical minerals from foreign countries which lack sufficient labor and environmental standards and risks thousands of union jobs for American workers.

The International Union of Operating Engineers (IUOE) is one of North America's leading construction unions, representing over 400,000 hardworking men and women in the United States and Canada. Most members of the IUOE work in the construction sector, operating and maintaining heavy equipment; thousands of us are employed building the nation's roads, bridges, highways, and other transportation infrastructure.

The IUOE opposes the U.S. Forest Service taking any action to pursue the withdrawal of lands and minerals in Northeastern Minnesota from future leasing, exploration, and potential development. This action ignores the established and rigorous environmental review process for mining projects. The withdrawal would provide no additional environmental protections than those that currently exist under state and federal law and established environmental standards including the National Environmental Policy Act.

The comprehensive, science-based environmental review process for one company that has invested in advancing a world-class mining project in this region is already underway. The Twin Metals Minnesota underground copper, nickel, cobalt, and platinum group metals mining proposal has been under review since the

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company submitted its plan in late 2019. That regulatory process requires years of detailed scrutiny of Twin Metal's operational plans and potential impacts under multiple federal, tribal, and state government entities, in addition to several opportunities for public comment.

The Twin Metals project has evolved significantly over the past decade, with a focus on reducing the overall footprint and any potential environmental impacts. In that time, the company has reduced its overall daily production rate from 50,000 tons per day to 20,000 tons per day, and the project shifted from a conventional tailings management system to dry stack tailings, a move hailed by more than 140 NGOs as the best available tailings management standard. This has allowed for removing a slurry pipeline from the original design and reducing the overall surface footprint of the project.

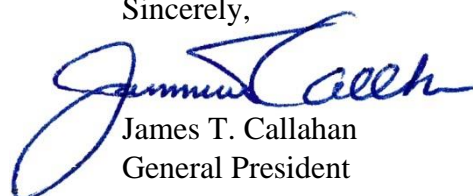
Currently, the United States is overly reliant on foreign critical mineral suppliers. The proposed land withdrawal runs counter to President Biden's commitments to address the climate crisis, shore up domestic supply chains and bolster American jobs. The minerals in this area are critical for low-carbon technologies like electric vehicle batteries, wind turbines and solar panels.

A vast supply of critical minerals like copper and nickel lies beneath American soil, especially in the resource-rich Duluth Complex of Minnesota. If we do not responsibly develop a domestic critical minerals industry, we will continue to rely on countries with some of the loosest, most egregious environmental and labor legal frameworks in the world. Countries like Argentina, Chile, China, and the Congo. The South American countries' environmental and labor records, where workplace hazards and occupational deaths occur frequently, raise significant policy concerns. Perhaps needless to say, China also presents a raft of policy considerations regarding forced labor, human rights abuses, environmental degradation, and more.

Finally, this land withdrawal proposal will put thousands of family-supporting union jobs at risk, a loss of \$1.5 billion in annual wages, and more than \$2.5 billion in annual economic production, based on studies conducted by the University of Minnesota Duluth. Furthermore, this withdrawal threatens \$2.4 billion in royalty revenue for the state's Permanent School Trust Fund that supports nearly 900,000 Minnesota K-12 students.

The International Union of Operating Engineers urges the U.S. Forest Service to reject this decision and its devastating impact on the future well-being of Minnesota residents and communities as well as the nation. We can mine these critical minerals here, while protecting the environment, protecting America's national interests, and creating good paying union jobs. The alternative is to import these critical minerals from countries which lack sufficient labor and environmental standards.

Sincerely,

A handwritten signature in blue ink that reads "James T. Callahan". The signature is stylized and fluid, with the first name being particularly prominent.

James T. Callahan
General President

INTERNATIONAL UNION OF OPERATING ENGINEERS

LOCAL NO. 49, 49A, 49B, 49C, 49D, 49E, 49L
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To: F. David Radford – Deputy State Director of Geospatial Services, BLM Eastern States Office

From: Jason George – Business Manager, International Union of Operating Engineers, Local 49

Date: January 8, 2022

Subject: Scope of Environmental Analysis

On behalf of the International Union of Operating Engineers, Local 49 ("Local 49") which represents over 14,000 heavy equipment operating engineers across Minnesota, North Dakota, and South Dakota I am submitting this comment in opposition of the U.S. Forest Service taking any action to pursue the withdrawal of lands and minerals in northeastern Minnesota from future leasing exploration, and potential development.

Local 49 appreciates this opportunity to comment on the scope of the environmental analysis. We believe that there should be an active process, such as the one currently in place, to permit mining in this region of the Superior National Forest. This is the only way to create a robust and complete public record for each individual project, and to accurately assess it on the unique risks and benefits involved at that site. This process allows for advancements in technology and methods to mitigate historic risks associated with mining or any other industry. It gives all interested parties a chance to shape the process with the experiences, expertise, and information they can provide. In contrast the proposed withdrawal does not even attempt to assess the realistic risk of a project, but rather cites generalized historic risks of mining processes to exclude all mining from the area.

Local 49 asks that the environmental analysis study all effects the proposed withdrawal would have on the people of the region. The Applicant sites a few potential effects on residents and visitors of the region based on risk factors that may or may not be associated with any mining projects currently proposed. These are important considerations but would be better served by the current process which reviews these factors on a case-by-case basis and determines risk based on the facts surrounding an individual project. Unfortunately, the proposed withdrawal will only prevent the environmentally responsible projects, that would otherwise have made it through this rigorous permitting process, if it replaces the current standards. Preventing these projects will provide minor risk mitigation to the environment or people of the region, but the loss of these projects will cause substantial, definite, and unambiguous economic and social consequences. We would ask that the environmental analysis evaluate the change to environmental risk the proposed withdrawal would accomplish when compared with projects that would be permitted through the exhaustive environmental standards of the current process.

Local 49 understands that the potential benefits of these mining projects are not the primary aim of the environmental analysis. However, they are too important to not consider, especially when weighed against the minimal potential risks presented by mining projects that are able to gain approval through Minnesota's rigorous permitting process. Many of our members have lived on the Iron Range their entire lives and hold mining as a vital component of their community. The proposed mining projects will harvest resources that are critical to sustain continued growth in domestic renewable energy and advanced electronics supply chains. This region contains underground reserves of strategic minerals that are just as unique as the environmental and recreational resources found on the surface. Minnesota's strong environmental & labor standards along with its thorough permitting process mean that these metals will be sourced in the safest and most environmentally conscious way possible. This is drastically different from the poor conditions, forced labor, and massive environmental degradation found in the mining industries of some other global producers.

The Applicant cites the administrative burden of analyzing additional new mining proposals as a reason to implement the proposed withdrawal. Staffing difficulties should not be a basis for banning the work of an entire industry from a region. Companies and other parties put forth tremendous effort to provide each agency with the information they feel is critical to fully understand each facet of a project. Many of these projects require decades of work to study and permit, but this work ensures that each proceeding can be tailored, through public comment and environmental review, to highlight

the local benefits and potential risks of the project in question. An argument of insufficient staffing to complete the preparatory analysis and survey work would not be accepted from any company looking to obtain a mining permit, and it should not be accepted from a government agency attempting to deny them the right to that permitting process.

Local 49 believes strongly that Minnesota's regulatory and environmental review of potential non-ferrous mining needs to be based on the individual siting, design, and geology of each project. If a project meets these strict standards, we should build it. If it doesn't meet the standards, we will not support it, and no one should. We do not agree with the Applicant's proposed blanket withdrawal of approximately 225,378 acres of National Forest System lands in the Rainy River Watershed on the Superior National Forest in northeastern Minnesota from disposition under the mineral and geothermal leasing laws for 20 years. We ask that they environmental analysis include alternatives that follow the current system of permitting for this region. We also ask that the negative economic and societal effects a ban on mining in this area would have on the surrounding communities be studied.

Thank you for your time and consideration.

A handwritten signature in cursive script that reads "Jason A. George".

Jason A. George
Business Manager - Financial Secretary
International Union of Operating Engineers, Local 49

LIUNA Minnesota and North Dakota (“LIUNA”) offers the following comments on the proposal by the United States Forest Service (“USFS”) and Bureau of Land Management (“BLM”) to withdraw 225,000 acres of lands and minerals in Northern Minnesota from future exploration and leasing. LIUNA believes that the current Federal and state rules for permitting mining exploration and operations are more than adequate to protect the Superior National Forest and Boundary Waters Canoe Area Wilderness (“BWCAW”) from pollution, impairment or destruction. In fact, we believe that the existing permitting framework provides better long-term protection to BWCAW and the Superior National Forest than the proposed withdrawal.

LIUNA members work across the construction industry on projects large and small, ranging from residential and commercial buildings to civil infrastructure to energy and industrial facilities. While we are known as Minnesota’s Infrastructure Union, LIUNA can also be described as an environmental union based on the nature of our work and our deep engagement with environmental policy and projects.

On any given day, LIUNA men and women are working across Minnesota on projects whose purpose is the protection and enhancement of natural resources. Whether our members are replacing a section of sewer or oil pipeline; maintaining environmental controls at a mine or power plant; remediating asbestos, lead or hazardous waste; or managing stormwater on a building construction site, their objective is to protect our environment and ensure compliance with environmental regulation.

LIUNA values environmental protection, not only because our members do the work every day, but also because they appreciate Minnesota’s unique environmental resources and recognize the importance of a healthy environment to the well-being of their families and communities. Our members reject the notion that the state should choose between economic development and environmental protection -- we can and must do both.

The proposed mineral withdrawal will undermine the goals of the National Environmental Policy Act, the Minnesota Environmental Rights Act, and public support for environmental regulation.

Our organization also recognizes the critical role that environmental review and oversight play in the successful permitting and execution of building, infrastructure, and natural resource development projects. The construction and operation of buildings, roads, mines, pipelines, and renewable energy projects all have environmental impacts. Federal and Minnesota law and rule require that these impacts be considered not only to ensure that proposed development is compatible with environmental protection and the public interest, but also to identify opportunities to maximize benefits and minimize harms through the use of best practices in design, construction and operations.

Existing permitting requirements for exploration and mining operations are well-designed to accomplish these ends because they provide for thorough case- and fact-based evaluation of proposed mining projects which must show that they can adequately address environmental risks while minimizing and mitigating impacts. The rule also provides a framework for Federal and state agencies to consider and balance competing public interests while leveraging the expertise of staff, stakeholders and applicants.

A rule that bans mining in the Rainy River Watershed or imposes restrictions that produce the same result, by contrast, would render science and fact moot, and strip permitting agencies of the ability to balance competing public interests. While some mining opponents might welcome rules that foreclose mining without regard to facts as a boon to the environment, we fear that the end result could harm not only the state's economy, but also public support for environmental protection.

It is no secret that many who live in Northern Minnesota -- along with many Minnesotans who work in agriculture, construction, manufacturing, and other industries that rely on natural resources -- have mixed feelings about the burden placed on their businesses and jobs by state environmental rules and regulations. Our members have often expressed frustration over delays in approval of projects and resulting loss of work opportunities during lengthy environmental reviews.

While we share their frustration, LIUNA has consistently supported robust environmental review and rejected proposals to water down or circumvent the permitting process by legislating outcomes because we continue to believe that worthy projects can reach the finish line. In recent years, however, we have seen the push to circumvent the permitting process come not from project proponents, but from opponents who seek to replace meaningful environmental review with blanket prohibitions. Such prohibitions jeopardize not only jobs and economic opportunity but also the increasingly fragile public consensus that undergirds environmental regulation. Today, it seems that LIUNA members have a greater commitment to the integrity of the state's environmental permitting processes than opponents who seek to end-run meaningful review.

In addition to undermining public support for needed environmental regulation, an explicit or de facto ban on mining would deprive Minnesota of more than the thousands of jobs and hundreds of millions of dollars in economic opportunity associated with a successful mining application. And worst, from an environmental perspective, a restrictive rule could choke off resources for environmental solutions. While the current rule encourages and incentivizes mining companies to expend private capital assessing resources and developing solutions to potential environmental risks and impacts, a withdrawal of mining permits in the Rainy River Watershed would do the opposite .

Under the current regulatory framework, even a failed mining proposal has the potential to deliver a roadmap and raise the bar for future proposals. As in the scientific process, today's failure can become the foundation for tomorrow's success. On the other hand, an explicit or de facto ban on mining would shut the door on innovation by discouraging mining companies from attempting to solve for environmental risks and impacts. Just as a prohibition on autopsies

stunted medical science in the Middle Ages, arbitrary rules that prevent applicants from proposing mining operations near environmental resources risk deferring or killing innovations that could reconcile environmental and socioeconomic objectives.

An explicit or de facto ban on mining in the Rainy River Watershed would be arbitrary and capricious, and would contradict the clear intent of Congress and the Minnesota Legislature.

We are not aware of any evidence that would support an arbitrary exclusion for mining in the Rainy River Watershed. Beyond the lack of record evidence in support of such a policy, the fact that more than a dozen nonferrous mines have operated in the vicinity of BWCAW and Quetico Provincial Park without impairing the environmental resources of either should provide sufficient proof that an explicit or de facto ban cannot be justified. Such a step would amount to replacing a permitting process grounded in law, science and detailed review of applicants' plans with regulation by broad generalization and sound bite.

The value of BWCAW has been recognized by both Congress and the Minnesota Legislature, not to mention the many LIUNA members who enjoy a personal connection to the wilderness area. At the same time, BWCAW is just one of many environmental resources deserving of protection. When Federal and state legislators determined decades ago that BWCAW deserves special consideration, legislators defined the geographic area requiring such treatment and established specific limits, leaving mining proposals in the remainder of the Rainy River Watershed to be evaluated on the same basis as proposals in other regions of the state.

Federal and state law already demarcate lands in and around the BWCAW where legislators determined that a different set of standards was needed. The effort to accomplish by agency action what legislators have declined to enact in statute is nothing less than an attempt to circumvent legislative process that should be rejected for that reason alone.

The proposed mineral withdrawal could have profound and negative effects on our economy and efforts to combat climate change.

The Duluth Complex contains the world's largest undeveloped copper-nickel deposits, including the overwhelming majority of nickel, platinum, cobalt resources known to exist in the United States along with a third of the nation's copper. Mining operations in the Duluth Complex that meet high Federal and state environmental standards have the potential to make a major contribution to the state's economy, and to Minnesota's nation-leading system of public education through the Permanent School Trust Fund.

Taconite mining is currently the leading source of economic opportunity, not only for mine employees and skilled trades, including LIUNA members, but Northern Minnesota as a whole. At the same time, the taconite industry is subject to volatile commodities markets and foreign competition that can destabilize mining operations and their beneficiaries, including local workers, communities, and tax revenues for schools and other public institutions.

Development of nonferrous mineral resources has the potential to help stabilize Northern Minnesota's economy, not to mention School Trust Fund finances, by tapping into demand for minerals whose price does not move in lockstep with taconite. While copper, nickel and cobalt are also sold on international markets, demand for these metals is almost certain to grow rapidly across the globe to supply the need for minerals that are critical to the production of clean energy technologies. For example, wind and solar energy and electric vehicles ("EVs") require roughly five times more copper than conventional technologies, and the disparity is far greater for nickel and cobalt which play an essential role in EVs and battery power storage.

Imposition of arbitrary restrictions on mining in the Rainy River Watershed could foreclose significant economic development opportunities by prohibiting potentially sustainable operations in the area; creating regulatory uncertainty that discourages investors from exploring mining opportunities outside the watershed; and moving the state down a slippery slope that could lead to explicit or de facto bans on mining in other portions of the Duluth Complex that adjoin other high-value environmental resources. While the current rules allows agencies to weigh post-mitigation environmental impacts against socioeconomic and environmental benefits, under the proposed withdrawal that excludes areas from consideration it would become impossible to determine what might have been, let alone seize win-win opportunities.

Restrictions on mining in the Rainy River Watershed or elsewhere in the Duluth Complex could also have a profound impact on local and global efforts to fight climate change. Even though the energy transition has barely begun, we are already experiencing disruptions and rising costs in clean energy and electric vehicle supply chains. Solar energy developers, for example, are reeling not only from the rising cost of copper and graphite, but also from allegations of human rights abuses, including use of slave labor, within the solar panel supply chain which could trigger Federal trade sanctions. Electric vehicle manufacturers face similar challenges procuring affordable and sustainable supplies of nickel and cobalt.

Minnesota's high environmental and labor standards leave the state ideally positioned to meet growing global demand for sustainably-sourced copper, nickel and cobalt, but only if we pursue opportunities to responsibly develop critical minerals rather than choosing to arbitrarily reject mining proposals. As stewards of the world's largest undeveloped deposits of such minerals, the decisions we make will directly impact the ability of our state, nation and world to achieve rapid and affordable reductions in carbon emissions. In fact, given the scale of our mineral resources compared to carbon emissions, the climate impact of decisions on mining will far outweigh any other decisions we make in Minnesota with respect to decarbonization.

The painful irony is that efforts to protect the BWCAW could end up helping to destroy it by locking up critical mineral resources that are desperately needed to quickly deploy the technologies needed to halt climate change. While an unregulated mining operations might, in theory, pose a greater direct threat to BWCAW than climate change, current rules require mines to meet standards that effectively ensure a nonferrous mine will do more good than harm by supporting solution that protect the Boundary Waters and the rest of the state's high-value environmental resources from climate change. As an organization whose members have advocated for climate solutions and made sacrifices to support decarbonization, it would be frustrating to see climate progress derailed because environmental advocates who pay lip

service to a climate crisis were unwilling to prioritize climate when it affects their policy preferences.

There is no reason to depart from a permitting framework that has protected the environment while supporting sustainable economic development for decades.

Current Federal and state processes for permitting mining projects have resulted in the production of some of the world's most environmentally-sustainable iron ore from mines that coexist with exceptionally high-quality water and ecological resources. Minnesota's mining industry has thrived under high environmental standards, and we believe that we are well positioned to succeed in a global economy where decarbonization and other environmental attributes are increasingly valued.

We believe that the same result can be achieved for the production of nonferrous metals provided that the industry is given the opportunity to propose plans that seek to address challenges specific to nonferrous mining. Nonferrous mining failures elsewhere in the world should not automatically disqualify proposals here any more than the existence of polluting iron mines elsewhere in the world should be used as evidence against Minnesota mines.

Minnesota's taconite industry and regulators have already proven that we can operate mines with standards that far exceed the average for the rest of the world. We should not assume that the same result cannot be achieved in nonferrous mining. To the degree that USFS and BLM consider environmental justice, it is also important to weigh how locating mining in Minnesota, which has the strong regulatory framework and industrial capacity needed to prevent environment damage, can help to prevent environmental damage and injustice in areas of the globe that will produce critical minerals if Minnesota does not.

The fact that Minnesota's natural resource industries are capable of meeting much higher environmental standards than competitors should not come as a surprise. Not only does the state benefit from a robust, professionally managed system of environmental regulation, but we also have unparalleled capacity in the form of responsible contractors and skilled workforce that are capable of building, maintaining, and operating facilities to the specifications established by regulators.

We thank you for your consideration and for the hard and thoughtful work that USFS and BLM staff put into consideration of mining and other proposals that impact public resources.

January 19th, 2022

Attn: F. David Radford, Deputy State Director of Geospatial Services

BLM Eastern States Office

5275 Leesburg Pike, Falls Church, Virginia 22041

**RE: Comments Opposing the Withdraw Superior National Forest Withdrawal Application
[Docket No. LLES960000.L1440000.ET0000.223 MNES-059784]**

The Laborers' International Union of North America (LIUNA) submits the following comments in opposition to the United States Forest Service (USFS) and the United States Bureau of Land Management (BLM) proposal to withdraw 225,000 acres of federally owned land and minerals in northeast Minnesota from future leasing, exploration and potential development.

LIUNA proudly represents over 500,000 members throughout North America, who predominately work within the construction industry. Our members are on the job, every day, building our nation's critical infrastructure and working to advance our competitiveness. Whether they are installing wind and solar facilities or constructing a new port for commerce, LIUNA members are the backbone of America. This includes thousands of skilled construction laborers in Minnesota who have spent their careers working within the mining sector.

As one of our nation's oldest unions, LIUNA members have been involved with Minnesota mining for the better part of a century. Mining has provided a pathway to a strong middle class for generations of laborers. It is hard to believe that now, as Minnesota is on the cusp of leading development of critical minerals for a global clean energy transition, the federal government is considering putting on the brakes and threatening our members' future livelihoods.

Northern Minnesota contains our nation's largest untapped deposits of our country's critical minerals, including copper, nickel, cobalt, and platinum. A decision by USFS and BLM to move forward with the proposed mineral withdrawal, banning future leasing and development, would adversely affect Minnesota's economy and the world's energy future; sacrificing billions of dollars in potential investments, wages, and taxes. Equally important, thousands of local union job opportunities for Minnesotans will be relinquished.

The Biden Administration has pledged to "build back better", with good paying union jobs. LIUNA prides itself on its local membership who live and work within the surrounding communities of the projects they are working on. The construction and maintenance of

mining projects provides sustained employment for skilled laborers in Northern Minnesota. LIUNA members complete the necessary union apprenticeship training programs to ensure they are equipped with the highest skills and safety protocols. Coupled with decades of experience, our workforce is second to none.

The Biden Administration has pledged to combat climate change and decrease our nation's carbon footprint by reducing our dependence on fossil fuels. Accomplishing this goal will require building out wind and solar generation to provide clean renewable energy, constructing charging stations on our nation's roads, and incentivizing the use of electric vehicles (EVs) for transportation. But each of these clean energy technologies requires ample and affordable supply of these critical minerals that can be found in Northern Minnesota. It is important for us to mine these vital resources here in the United States, with union labor, rather than importing them from countries whose regulations are far less environmentally friendly.

The USFS and BLM have emphasized their concerns in protecting and preserving the surrounding environment. We understand that proper regulations and environmental permitting reviews will play a critical part in order to safely mine these critical resources. This is nothing new to Minnesota's mining sector, since the state already has the necessary regulatory framework and decades of successful experience with iron mining. All proposed mining projects must go through a comprehensive environmental review process and demonstrate that they can meet stringent standards and requirements established by the relevant governing agencies before any permits can be issued.

Mining these essential resources domestically, with union labor, for the purpose of assisting the fight against climate change at home and abroad is something our entire nation should support. During World War II, Minnesota's iron mines played a crucial role in a global effort to defeat Fascism by supporting production of aircraft, ships, tanks, and guns. Today, Minnesota minerals should be supporting the manufacture of wind turbines, solar panels and batteries.

LIUNA Minnesotan members, along with their fellow building trades unionists are ready to work. We ask that you rescind your proposal to ban leasing for the purposes of mining and development of natural resources in northern Minnesota.



January 17, 2022

F. David Radford, Deputy State Director of Geospatial Services
BLM Eastern States Office
RE: Superior National Forest Withdrawal Application
5275 Leesburg Pike
Falls Church, Virginia 22041

Bureau of Land Management:

We are writing on behalf of the Minnesota Building and Construction Trades Council to express our opposition to the U.S. Forest Service and BLM proposal to withdraw 225,000 acres of land and minerals in northeast Minnesota from future leasing, exploration and potential development, because we are deeply concerned about the negative consequences this withdrawal would have on our state's economic future.

Our organization represents more than 70,000 skilled union construction professionals in Minnesota working in 15 trades. Our members live and work on projects across the State of Minnesota. Not only are our members highly trained professionals, they are members of our community with a stake in assuring that our environment is protected for future generations.

This withdrawal proposal puts in jeopardy thousands of potential future jobs from Minnesota's mining industry that our members would stand to benefit from. Mining has sustained Minnesota, coexisting with the wilderness and other industries, for more than 130 years. Minnesota's iron industry currently supports more than 4,000 workers with good, family-sustaining jobs. We are also blessed with the world's largest undeveloped copper-nickel deposit, called the Duluth Complex, and several companies – in various stages of exploration, review and permitting - have invested heavily in developing this resource. While these projects are not yet operational, the non-ferrous industry has the potential to support our members and the families and communities of this region for generations to come.

We also believe that this proposal ignores the long-established, stringent regulatory and environmental review processes that are already in place to provide clear and complete authority for state and federal agencies to thoroughly review and regulate or deny approval for any mining project in Minnesota to ensure it meets the standards in place. Conducting a general environmental assessment on a broad area in northeast Minnesota, rather than studying the specific details of a proposed project, sets a dangerous precedent.

The comprehensive, science-based environmental review process for one company that has invested in advancing a world-class nonferrous mining project in this region is currently underway. Twin Metals Minnesota's proposed underground copper, nickel, cobalt and platinum group metals mining project has been under review since the company submitted its mine plan in late 2019. That regulatory process requires years of detailed scrutiny of Twin Metals' operational plans, its unique geology and potential impacts under multiple federal, tribal and state government entities, in addition to several opportunities

for public comment. This is the right way to determine if a mining project can proceed.

The Minnesota Building and Construction Trades Council is also concerned with this withdrawal proposal because it could unnecessarily block access to one of the most important deposits of critical minerals in the United States and the world. The Duluth Complex contains vast amounts of domestic sources of minerals needed to address many of our top priorities. This includes developing the technologies needed to fight climate change, creating good American jobs, securing our supply chains and strengthening our domestic security. We can make significant progress on all of these priorities through responsibly developing the minerals in the Duluth Complex, and we can do so under some of the world's strictest labor and environmental standards.

The council supports a robust regulatory review of specific mining projects in our region. We do not support the mineral withdrawal proposed by USFS and BLM because of the negative consequences it would have for Minnesota and because it arbitrarily and unnecessarily puts at risk an area of our country that is vital for our nation's ability to address our most pressing challenges.

Respectfully,

Joe Fowler, President
Tom Dicklich, Executive Director
Minnesota Building and Construction Trades Council

January 12, 2021
F. David Radford
Deputy State Director of Geospatial Services
BLM Eastern States Office
5275 Leesburg Pike
Falls Church, VA 22041
Submitted via email: BLM_ES_Lands@blm.gov

RE: Superior National Forest Withdrawal Application

On behalf of the North Central States Regional Council of Carpenters, I submit these comments in response to the *Notice of Application for Withdrawal and Segregation of Federal Lands; Cook, Lake, And Saint Louis Counties, MN; 86 FR 58299*.

The North Central States Regional Council of Carpenters represents 28,000 carpenters, millwrights, pile drivers, floor coverers, cabinet makers and other skilled professionals in the construction and wood products industry in Minnesota, Wisconsin, North Dakota, South Dakota, Iowa, and Nebraska. Our members have a direct interest in this case because they work in industrial facilities, including the mines in Northern Minnesota, the power plants that provide electricity to them, the manufacturing plants that supply them and that use their raw materials. We also install wind turbines and utility-scale solar projects and other processing and manufacturing facilities that need locally produced sources for copper, nickel, cobalt and other minerals. Lastly, our members would build and maintain any facilities built for nonferrous mining in Minnesota.

For generations, our members have built, maintained, and worked in the taconite mines of Northern Minnesota and have first-hand experience with the sophisticated safety and environmental practices of modern mining. We believe that the proposed mineral withdrawal is unnecessary and would have significant detrimental impacts on the livelihood of our members in the region, the local economy, and our ability to domestically source materials that are needed to fight climate change.

We object to this withdrawal for many reasons. First, as President Biden's administration has pointed out, the copper, nickel, and cobalt in this region are essential to our nation's ability to fight climate change. President Biden and his administration have promised to create good, union jobs in the process of transforming our economy to a more sustainable one. One great opportunity to do just that is to create a domestic supply chain for electric vehicle charging stations, electric car batteries, solar panels, and wind turbines our country needs. The Duluth Complex holds, by far, our nation's largest supply of these minerals and the actions of the federal agency are directly contrary to this goal.

Second, the US Forest Service and Bureau of Land Management, along with other federal and state agencies, already have substantive processes in place to evaluate specific mine plans and study their actual designs and impacts, rather than conduct a surface-level evaluation of mining in the area. In fact, Twin Metals has proposed a specific Mine Plan of Operation. We believe in science, and firmly hold that

the appropriate role for the USFS and BLM is to conduct in-depth study on the specific plans for this mine and any potential impacts.

Third, mining has long been a desired condition in the Superior National Forest, outside of the Boundary Waters Canoe Area and the Mining Protection Area. This action goes against long-standing government policy and would have a chilling effect on business investment in the region. Any environmental assessment done in conjunction with this withdrawal application must consider the impacts on workers and local communities due to your actions.

Finally, the environmental assessment proposed during the two-year moratorium that could lead to a 20-year withdrawal is substantively inadequate to determine the impacts of such a move. Here are questions that we believe must be answered before a withdrawal can be confirmed. What is the environmental impact of mining copper, nickel, and cobalt overseas, then shipping it back to the US? How does preventing the dramatic reduction in the carbon footprint of these raw materials by locally sourcing them impact climate change? What are the environmental and safety conditions of existing copper, nickel, and cobalt mines around the world, and how would preventing modern mines from opening in this region improve those conditions? What is the forecast demand for these minerals, and what is the missed opportunity cost for local workers and communities if this withdrawal prevents this local economic development? Given that demand for these minerals is forecast to increase dramatically, could preventing the development of these critical minerals in Northern Minnesota make it harder to meet the demand for them and imperil our fight against climate change?

We firmly believe that protecting the Boundary Waters Canoe Area Wilderness is of the utmost importance. But we also firmly believe in science and trust our regulatory experts. We need these minerals, and we need to protect our water. The role of your agencies should be to ensure that both can happen for the public good. Preemptively withdrawing over 225,000 acres of the most mineral-rich land in the country from mining is contrary to public policy, ignores any rigorous scientific analysis, and is a slap in the face to local workers and our communities. Please rescind this withdrawal notice and spend the time and energy of your agencies studying the actual mine plans before you.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Duinick". The signature is fluid and cursive, with a large initial "A" and "D".

Adam Duinick
Director of Government Affairs
North Central States Regional Council of Carpenters



MINNESOTA PIPE TRADES ASSOCIATION

Affiliate of the United Association

Composed of Journeyman and Apprentices of the Plumbing and Pipe Fitting Industry
Of the United States and Canada

State Federation of Labor – A.F.L.-C.I.O.

David Ybarra II, President
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(651) 291-5001
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Jason Quiggin, Secy.-Treas.
4402 Airpark Blvd
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January 17, 2022

F. David Radford
Deputy State Director of Geospatial Services
BLM Eastern States Office
5275 Leesburg Pike
Falls Church, VA 22041
Submitted via email: BLM ES Lands@blm.gov

RE: Superior National Forest Withdrawal Application

I submit these comments on behalf of the Minnesota Pipe Trades Association, in response to the Notice of Application for Withdrawal and Segregation of Federal Lands; Cook, Lake, and Saint Louis Counties, MN; 86 FR 58299.

Minnesota Pipe Trades Association is an umbrella organization representing eleven (11) Local Unions and nearly 10,000 men and women working in piping related industries throughout Minnesota, including craft professionals that construct and maintain industrial facilities, including mines in northern Minnesota, and the power plants that provide electricity to them.

I oppose the U.S. Forest Service and BLM taking any action to pursue the withdrawal of lands and minerals in northeast Minnesota from future leasing, exploration, and potential development. This action ignores the established environmental review process for mining projects. The withdrawal would provide no additional environmental protections beyond those that currently exist under state and federal law, including the National Environmental Policy Act.

The proposed withdrawal runs counter to President Biden's commitments to address the climate crisis, shore up domestic supply and bolster American Jobs. The minerals in the Duluth Complex are critical for low-carbon technologies like electric vehicle batteries, wind turbines, and solar panels. Minnesota contains the vast majority of the U.S. domestic resources for important minerals including nickel, cobalt, and copper. If we do not source these minerals here, then the administration must consider the human rights and environmental costs to continuing to source these materials from other countries where worker protections and environmental standards are non-existent.

Duluth-Detroit Lakes
Plumbers and Pipefitters
Local #11

Minneapolis-St. Cloud
Plumbers
Local #15

Minneapolis-St. Cloud
Pipefitters
Local #539

Minneapolis-St. Paul
Sprinkler Fitters
Local #417

Minneapolis
Gas Workers
Local #340

Moorhead
Plumbers and Pipefitters
Local #300

Rochester
Plumbers and Pipefitters
Local #6

St. Paul – Mankato
Plumbers
Local #34

St. Paul – Mankato
Pipefitters
Local #455

Virginia
Plumbers and Pipefitters
Local #589

Road Sprinkler Fitters
Local #669
District 28

We have some of the strongest environmental regulations in the world in Minnesota; we also have extremely high labor standards, along with a skilled union workforce ready to get to work on mining projects. In Minnesota, we can advance modern mines that will develop the minerals we need to fight climate change safely.

Additionally, I urge the Forest Service to pursue a full Environmental Impact Statement (EIS) – not an Environmental Assessment – to thoroughly examine *all* the scientific evidence and record that would impact this decision. Without a full EIS, you are rejecting the science-based regulatory process. The EIS must include evaluating the full scientific record of the Twin Metals Minnesota mine proposal.

Minnesota Pipe Trades Association supports an established, transparent, predictable and fair review process. Our advocacy has been and continues to reflect this approach: if the process reveals that a project is compliant, we feel it should advance. Conversely, if the project is deemed non-compliant, our belief it is the responsibility of the project owner/developer to make the necessary changes to come into compliance.

Industry and clean water are not mutually exclusive. Sincerely,

We can mine the minerals key to the President’s climate change and domestic supply goals, and we can do it safely. It is time to trust the science and trust our regulators!

Sincerely,

A handwritten signature in blue ink, appearing to read "DMY II", is written over a horizontal line.

David M. Ybarra, II

President

Minnesota Pipe Trades Association